

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:)	Bankruptcy No. 23-20371-GLT
)	
Jaison Kelly,)	Chapter 13
)	
Debtor.)	Document No.
)	
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Jaison Kelly,)	Related to Document No.
)	
Movant,)	
vs.)	
Ronda J. Winnecour, Trustee,)	Hearing Date & Time: March 13, 2024 at 10:30 a.m.
)	
Respondent.)	

MOTION TO DISMISS CHAPTER 13 CASE

AND NOW comes the Debtor, by and through his attorney, Brian C. Thompson, Esquire, and the law firm of Thompson Law Group, P.C., and files this Motion to Dismiss Chapter 13 Case representing as follows:

1. The Debtor, pursuant to 11 U.S.C. § 1307(b), hereby respectfully requests to dismiss the above-captioned Chapter 13 case.
2. Debtors commenced this Chapter 13 case on February 21, 2023 to attempt reorganize his debts. Debtor appeared at all Meetings of Creditors and hearings that required his attendance.
3. At the time of filing, Debtor had a good faith belief that he was entitled to relief under Chapter 13 of the Bankruptcy Code and that he could fulfill his duties under the confirmed plan and has worked diligently toward that goal. Debtor has paid \$28,511.00 in total plan payments.

4. Despite his good faith belief, Debtor's monthly payment for his Chapter 13 plan is no longer affordable or feasible, as a result of \$28,329.00 in plan arrears.
5. Section 1307(b) of the Federal Bankruptcy Code states that the court shall dismiss a case under this Chapter upon request of the Debtor. Debtor's present case has never been converted.

WHEREFORE, Debtor prays that this bankruptcy case be dismissed without prejudice.

Date: February 16, 2024

s/Brian C. Thompson

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